

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF TOM BLIKRE IN
SUPPORT OF PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING
ORDER

1. I am over 18 years of age, am competent to testify, and have personal knowledge of the facts set forth herein. I am the Senior Information Security Analyst of a wholly owned subsidiary of Plaintiff Getty Images, Inc. ("GETTY IMAGES"). I am responsible for designing, developing, and administering the security system for GETTY IMAGES's computer network and systems. It is part of my role to work with our legal team to ensure that all forms of relevant information are preserved when I am notified that litigation is anticipated.

2. On November 30, 2016, Mr. Jon Miller, Senior Vice President, Chief Information Officer, sent me an email, asking whether Ms. Roxanne Motamedi's email account was on GETTY IMAGES's litigation hold list and whether it was still accessible via Office 365 and/or her laptop and desktop computers. I confirmed that Ms. Motamedi's account had been placed on the litigation hold list and that her email had been preserved on GETTY IMAGES's legal hold server. I also noted that her email account had expired, meaning that it could not be logged into but a copy of the account was accessible via local PST files. (Ms. Motamedi's email account

1 had been exported to the legal hold server on November 10, 2016 as a result of being subject to a
2 litigation hold in unrelated matters and the fact that she had exited on November 7, 2016.)

3 3. On December 3, 2016, Ms. Lizanne Vaughan, Vice President, Corporate Counsel
4 at GETTY IMAGES, requested that I place Ms. Motamedi's email account in a spot where Ms.
5 Vaughan could access it and for the purpose of providing outside counsel access. I complied
6 with this request and made copies of Ms. Motamedi's email account available for Ms. Vaughan
7 and outside counsel via a READ ONLY share, thereby enabling them to search and review Ms.
8 Motamedi's email account. The original copies of Ms. Motamedi's email account remain on
9 GETTY IMAGES's Legal Hold server.


10 4. Over the course of the following days and weeks, Ms. Vaughan, through outside
11 legal counsel, advised me to add other employees to the same legal hold list and to provide
12 access to those mailboxes to our outside counsel for their review and examination.

13 5. I have reviewed Ms. Motamedi's full mailbox and determined that she sent 306
14 emails from her GETTY IMAGES's email address to her swissrox@gmail.com address. Ms.
15 Motamedi also sent an as-yet unknown number of emails to Roxanne.motamedi@gmail.com and
16 ml90049@gmail.com.

17 6. The documents and information that Ms. Motamedi forwarded to her personal
18 email addresses are available only through GETTY IMAGES's computer system, which requires
19 a password for access, and access is limited to only a select group of employees.

20 I declare under the penalty of perjury under the laws of the United States that the
21 foregoing is true and correct.

22 DATED this 11 day of December 2016, at Seattle, Washington.

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25 Tom Blikre

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DECLARATION OF TOM BLIKRE - 2

SEBRIS BUSTO JAMES
14205 S.E. 36th Street, Suite 325
Bellevue, Washington 98006
Tel: (425) 454-4233 – Fax: (425) 453-9005